

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Laura Sands,)	
)	
Petitioner,)	No. 14-1185
v.)	
)	
National Labor Relations Board,)	
)	
Respondent.)	

PETITIONER’S STATEMENT OF ISSUES TO BE RAISED ON APPEAL

Petitioner Laura Sands intends to raise the following issue on appeal:

(1) Whether the National Labor Relations Board erred in adopting the Administrative Law Judge’s decision that the Respondent Union was not required to provide Ms. Sands and other similarly situated employees, when it first sought to compel them to join or pay full dues pursuant to the forced unionism clause governing their employment, with the amount of the dues reduction they would receive if they chose to object under *Communications Workers v. Beck*, 487 U.S. 735 (1988).

(2) Whether the National Labor Relations Board erred in finding that it would be onerous or burdensome to require the UFCW Union to provide nonmembers and prospective *Beck* objectors with an initial notice that includes the percentage reduction in dues that objectors would receive if they chose to object.

(3) Whether the National Labor Relations Board erred in refusing to adhere to this Court's precedents in cases like *Penrod v. NLRB*, 203 F.3d 41 (D.C. Cir. 2000) and *Abrams v. Communications Workers of America*, 59 F.3d 1373 (D.C. Cir. 1995).

Date: October 27, 2014

By: /s/ Aaron B. Solem

Aaron B. Solem

Glenn M. Taubman

c/o National Right to Work Legal
Defense Foundation, Inc.

8001 Braddock Road, Suite 600

Springfield, VA 22160

Tel: 703-321-8510

Fax: 703-321-9319

abs@nrtw.org

gmt@nrtw.org

Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Statement of Issues to be Raised on Appeal was filed via the Court's ECF system and that the following parties were served via the ECF system or by mail:

Linda Dreeben
Douglas Edward Callahan
Robert J. Englehart
National Labor Relations Board
1099 14th Street, N.W.
Washington, D.C. 20570
appellatecourt@nlrb.gov

James B. Coppess
815 Sixteenth Street, NW
Washington, D.C. 20006
jcoppess@aflcio.org

Jonathan D. Karmel
221 North LaSalle Street
Suite 2900
Chicago, IL 60601

on this 27th day of October, 2014

By: /s/ Aaron B. Solem
Aaron B. Solem